

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

MDL No. 15-2666 (JNE/FLN)

In re Bair Hugger Forced Air Warming
Products Liability Litigation

**STATEMENT INSTEAD OF
REDACTED DOCUMENTS**

This Document Relates to All Actions

Plaintiffs have filed a Notice of Motion and Motion for an In Camera Review, together with a Memorandum of Law, and Exhibits 1-32.

The following Exhibits and/or deposition excerpts have been marked "Confidential" under the Protective Order, and/or redaction is impracticable.

1. Exhibit 1, which is a true and correct copy of Plaintiffs' Challenges to Work Product Claims.
2. Exhibit 2, which is a true and correct copy of Plaintiffs' Challenges to Attorney-Client Privilege Claims.
3. Exhibit 3, which is a true and correct copy of Plaintiffs' Challenges to Defendants' Priv. Log for Crime Fraud Exception.
4. Exhibit 4, which is a true and correct copy of Plaintiffs' September 28, 2016 Letter to Defense Counsel.
5. Exhibit 5, which is a true and correct copy of Defendants' October 28, 2017 Letter to Plaintiffs' Counsel.
6. Exhibit 6, which is a true and correct copy of Plaintiffs' November 8, 2016 Letter to Defense Counsel.
7. Exhibit 7, which is a true and correct copy of Defendants' November 28, 2017 Letter to Plaintiffs' Counsel.

8. Exhibit 8, which is a true and correct copy of Plaintiffs' December 7, 2016 Letter to Defense Counsel.
9. Exhibit 9, which is a true and correct copy of Defendants' December 21, 2016, Letter to Plaintiffs' Counsel.
10. Exhibit 10, which is a true and correct copy of Plaintiffs' January 20, 2017 Letter to Defense Counsel.
11. Exhibit 11, which is a true and correct copy of Plaintiffs' June 5, 2017 Letter to Defense Counsel.
12. Exhibit 12, which is a true and correct copy of 3MBH01192634.
13. Exhibit 13, which is a true and correct copy of 3MBH00544754.
14. Exhibit 14, which is a true and correct copy of Plaintiffs' First Request for Production of Documents and Things regarding Custodial Employment Files.
15. Exhibit 15, which is a true and correct copy of the transcript from the December 22, 2015 teleconference in *Walton v. 3M Co. et. al.*
16. Exhibit 16 is a true and correct copy of Defendants' Answers and Objections to Plaintiffs' Second Interrogatories.
17. Exhibit 17 is a true and correct copy of the Litigation Consultant Agreement between 3M and Gary Maharaj.
18. Exhibit 18, which is a true and correct copy of portions of the deposition of Gary Maharaj, taken March 19, 2015 in the *Walton v. 3M Co. et. al* matter.
19. Exhibit 19, which is a true and correct copy of Gary Maharaj's Affidavit, dated February 6, 2015.
20. Exhibit 20, which is a true and correct copy of MAHARAJ00000205.
21. Exhibit 21, which is a true and correct copy of MAHARAJ00000162.

22. Exhibit 22, which is a true and correct copy of MAHARAJ00000207.
23. Exhibit 23, which is a true and correct copy of portions of the Deposition of Gary Maharaj, taken in Minneapolis on January 18, 2017.
24. Exhibit 24, which is a true and correct copy of portions of the Deposition of Gary Hanson, taken in Minneapolis on November 2, 2016.
25. Exhibit 25, which is a true and correct copy of the Litigation Consultant Agreement between 3M and Teri Woodwick-Sides.
26. Exhibit 26, which is a true and correct copy of portions of the Deposition of Teri Woodwick-Sides taken in Minneapolis on December 8, 2016.
27. Exhibit 27, which is a true and correct copy of portions of the Deposition of Karl Zgota taken in Minneapolis on July 22, 2015.
28. Exhibit 28, which is a true and correct copy of portions of the Deposition of Karl Zgota taken in Minneapolis on February 24, 2017.
29. Exhibit 29, which is a true and correct copy of portions of the Deposition of John Rock, taken in Minneapolis on July 16, 2015.
30. Exhibit 30, which is a true and correct copy of portions of the Deposition of John Rock, taken in Minneapolis on November 4, 2016.
31. Exhibit 31, which is a true and correct copy of 3MBH00022877 .
32. Exhibit 32, which is a true and correct copy of portions of the Deposition of John Rock, taken in Minneapolis on November 4, 2016.

Plaintiffs file this Statement Instead of Redacted Documents pursuant to L.R. 5.6(d)(1)(A)(ii).

Respectfully submitted,

Dated: June 12, 2017

MESHBESHER & SPENCE LTD.

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